

# EXHIBIT C

**SAVERI & SAVERI, INC.**  
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**SAVERI & SAVERI, INC.**, an AV-rated law firm, was established in 1959. The firm engages in antitrust and securities litigation, product defect cases, and in general civil and trial practice. For over sixty years the firm has specialized in complex, multidistrict, and class action litigation.

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The Saveri Firm has extensive experience in antitrust class action litigation and trial experience, including leadership roles in many of the major antitrust class actions in the Northern District of California. In the last twenty-five years, representative leadership positions include: ***In re Citric Acid Antitrust Litig.***, MDL No. 1092, Case No. C-95-2963 FMS (N.D. Cal.) (Smith, J.) (appointed Co-Lead Counsel); ***In re Methionine Antitrust Litigation***, MDL No. 1311, Case No. C-99-3491-CRB (N.D. Cal.) (Breyer, J.) (appointed Co-Lead Counsel); ***In re Dynamic Random Access Memory Antitrust Litigation***, MDL No. 1486, Case No. 02-md-01486-PHJ (N.D. Cal.) (Hamilton, J.) (“*DRAM I*”) (appointed Co-Lead Counsel); ***In re Tableware Antitrust Litigation***, Case No. C-04-3514 VRW (N.D. Cal.) (Walker, J.) (appointed Chair of Plaintiffs’ Counsel); ***In re Static Random Access Memory (SRAM) Antitrust Litigation***, MDL No. 1819, Case No. 07-cv-01819-CW (N.D. Cal.) (Wilken, J.) (appointed to Steering Committee); ***In re Flash Memory Antitrust Litigation***, No. 4:07-CV-00086 SBA (N.D. Cal.) (Armstrong, J.) (appointed Co-Lead Counsel); ***In re TFT-LCD (Flat Panel) Antitrust Litigation***, MDL No. 1827, Case No. 07-md-01827 (N.D. Cal.) (Illston, J.) (member of plaintiffs’ executive committee); ***In re Cathode Ray Tube (CRT) Antitrust Litigation***, MDL No. 1917, Case No. 07-cv-5944-JST (N.D. Cal.) (Tigar, J.) (appointed Lead Counsel); ***In re California Title Insurance Antitrust Litigation***, Case No. 08-01341-JSW (N.D. Cal.) (White, J.) (appointed Co-Lead Counsel); ***In re Optical Disk Drive (ODD) Antitrust Litigation***, MDL No. 2143, Case No. 10-md-02143-RS (N.D. Cal.) (Seeborg, J.) (appointed Chair of Plaintiffs’ Executive Committee); ***In re Lithium Ion Batteries Antitrust Litigation***, MDL No. 2420, Case No. 13-md-2420-YGR (N.D. Cal.) (Gonzalez Rogers, J.) (appointed Co-Lead Counsel); ***In re Dynamic Random Access Memory (DRAM) Direct Purchaser Antitrust Litigation***, No. 18-cv-3805-JSW-KAW (N.D. Cal.) (White, J.) (“*DRAM II*”) (appointed Co-Lead Counsel).

In addition to these cases, the Saveri Firm has been appointed to lead major antitrust class actions in federal courts throughout the country. The Saveri Firm is known for its antitrust class action experience, dedication to vigorously prosecuting its cases, and working collaboratively and efficiently with other counsel.

## ***PARTNERS***

***R. ALEXANDER SAVERI***, born San Francisco, California, July 22, 1965; admitted to bar, 1994, California and U.S. District Court, Northern District of California; 1995, U.S. Court of Appeals, Ninth Circuit; 2000, U.S. District Court, Southern District of California and U.S. District Court, Central District of California; 2012, U.S. Court of Appeals, Third Circuit. *Education*: University of Texas at Austin (B.B.A., Finance 1990); University of San Francisco School of Law (J.D., 1994), University of San Francisco Maritime Law Journal 1993–1994. *Member*: State Bar of California; American Bar Association (Member, Antitrust Section); Association of Trial Lawyers of America; University of San Francisco Inn of Court; National Italian American Bar Association; University of San Francisco Board of Governors (2003–2006); Legal Aid Society (Board of Directors).

Mr. Saveri is the managing partner of Saveri & Saveri, Inc. After graduating from law school, he began working for his father and uncle at Saveri & Saveri, P.C. on antitrust and complex litigation. The current practice of Saveri & Saveri, Inc. emphasizes class action antitrust litigation.

He has an AV Preeminent Peer Review Rating on Martindale-Hubbell and was named a “Super Lawyer for Northern California” in 2019 and 2020.

Mr. Saveri has served or is serving as court-appointed Co-Lead or Liaison Counsel in the following cases:

***In re Lithium Ion Batteries Antitrust Litigation***, MDL No. 2420, Case No. 13-md-2420-YGR, United States District Court, Northern District of California (antitrust class action on behalf of direct purchasers of lithium ion batteries).

***In re California Title Insurance Antitrust Litigation***, Case No. 08-01341 JSW, United States District Court, Northern District of California (antitrust class action involving federal antitrust laws and California statutory law for unlawful practices concerning payments for title insurance in California).

***In re Intel Corp. Microprocessor Antitrust Litigation***, MDL No. 1717, United States District Court, District of Delaware (antitrust class action on behalf of all consumers in the United States that indirectly purchased Intel x86 microprocessors).

***In re Vitamin C Antitrust Litigation***, MDL No. 1738, United States District Court, Eastern District of New York (antitrust class action on behalf of all California indirect purchasers of Vitamin C).

***In re Polychloroprene Antitrust Cases***, J.C.C.P. No. 4376, Los Angeles Superior Court (antitrust class action on behalf of all California indirect purchasers of polychloroprene rubber).

***In re NBR Cases***, J.C.C.P. No. 4369, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of acrylonitrile-butadiene rubber (“NBR”)).

***Carpinelli v. Boliden AB***, Master File No. CGC-04-435547, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of copper tubing).

***Competition Collision Center, LLC v. Crompton Corporation***, Case No. CGC-04-431278, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of plastic additives).

***In re Urethane Cases***, J.C.C.P. No. 4367, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of urethane and urethane chemicals).

***The Harman Press v. International Paper Co.***, Master File No. CGC-04-432167, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of publication paper).

***In re Label Stock Cases***, J.C.C.P. No. 4314, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of high pressure label stock).

***Richard Villa v. Crompton Corporation***, Master File No. CGC-03-419116, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of EPDM).

***Russell Reidel v. Norfalco LLC***, Master File No. CGC-03-418080, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of sulfuric acid).

***Smokeless Tobacco Cases I–IV***, J.C.C.P. Nos. 4250, 4258, 4259 and 4262, San Francisco Superior Court (certified antitrust class action on behalf of California consumers of smokeless tobacco products).

***Electrical Carbon Products Cases***, J.C.C.P. No. 4294, San Francisco Superior Court (Private Entity Cases) (antitrust class action on behalf of California indirect purchasers of electrical carbon products).

***The Vaccine Cases***, J.C.C.P. No. 4246, Los Angeles Superior Court (medical monitoring class action on behalf of children exposed to mercury laden vaccines).

***In re Laminate Cases***, J.C.C.P. No. 4129, Alameda Superior Court (antitrust class action on behalf of California indirect purchasers of high pressure laminate).

***Compact Disk Cases***, J.C.C.P. No. 4123, Los Angeles Superior Court (antitrust class action on behalf of California consumers of prerecorded compact disks).

***Sorbate Prices Cases***, J.C.C.P. No. 4073, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of sorbate).

***In re Flat Glass Cases***, J.C.C.P. No. 4033, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of flat glass products).

***Vitamin Cases***, J.C.C.P. No. 4076, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of vitamins).

***California Indirect Purchaser MSG Antitrust Cases***, Master File No. 304471, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of Monosodium Glutamate).

***In re Aspartame Indirect Purchaser Antitrust Litigation***, Master Docket No. 06-1862-LDD, United States District Court, Eastern District of Pennsylvania (antitrust class action on behalf of California indirect purchasers of aspartame).

***GM Car Paint Cases***, J.C.C.P. No. 4070, San Francisco Superior Court (class action on behalf of all California owners of General Motors vehicles suffering from paint delamination).

***In re TelexFree Securities Litigation***, Master Docket No. 4:14-md-02566-TSH) (appointed to the executive committee in one of the largest pyramid scheme cases in history).

***GUIDO SAVERI***, born San Francisco, California, June 10, 1925; admitted to bar, 1951, California. *Education*: University of San Francisco (B.S., *summa cum laude*, 1947; LL.B., *summa cum laude*, 1950). *Member*: Bar Association of San Francisco; State Bar of California; American Bar Association (Member, Antitrust Section); Lawyers Club of San Francisco.

Mr. Saveri is a senior partner of Saveri & Saveri, Inc. He started the firm in 1959 and associated with Joseph L. Alioto, Esq. in the practice of antitrust and other corporate litigation. Between completing law school in 1951 and until forming his firm in 1959 he was associated with the law firm of Pillsbury, Madison & Sutro in San Francisco, California.

Mr. Saveri has testified before the Federal Judiciary Committee on antitrust matters and has lectured on antitrust matters before The Association of Trial Lawyers of America, the Federal Practice Institute, and other lawyer associations. Mr. Saveri has also written various periodicals on antitrust topics. Mr. Saveri was named the 2007 Antitrust Lawyer of the Year by the State Bar of California's Antitrust and Unfair Competition Law Section. He has the highest rating in Martindale Hubbell, namely, "AV" and was named a "Super Lawyer for Northern California" in 2010.

From the time he started his firm in 1959, Mr. Saveri has devoted practically all of his time to antitrust and other corporate and complex litigation. He has actively participated in antitrust cases involving myriad industries: electronics, electrical, water meter, scrap metal, liquid asphalt, dairy products, typewriter, vanadium, pipe-fitting, grocery business, liquor, movie, animal-raising business, chemical, snack food, paper label, chrysanthemum, drug, sugar, records, industrial gas, wheelchair, rope, copper tubing, folding cartons, ocean shipping, pancreas gland, corrugated container, glass container, fine paper, food additives, prescription drugs, medical x-ray film, computer chips, and many others.

***RICHARD SAVERI***, Partner, 1951–1999.

***LISA SAVERI***, born San Francisco, California, April 10, 1956; admitted to bar, 1983, California and U.S. District Court, Northern District of California; 1987, U.S. District Court, Eastern District of California; 2002, U.S. Court of Appeals, Ninth Circuit, U.S. District Court, Central District of California and U.S. District Court, Southern District of California. *Education*: Stanford University (A.B. Economics, 1978); University of San Francisco School of Law (J.D., 1983), University of San Francisco Law Review. *Member*: State Bar of California. *Experience*: Legal Extern, Hon. Eugene F. Lynch, Judge, U.S. District Court, Northern District of California (1982); Associate, Pillsbury Madison & Sutro (1983–1992); San Francisco Public Defender's Office (Summer 1989). *Publications*: G. Saveri & L. Saveri, Pleading Fraudulent Concealment In An Antitrust Price Fixing Case: Rule 9(b) v. Rule 8, 17 U.S.F. L. Rev. 631 (1983); L. Saveri, Implications of the Class Action Fairness Act for Antitrust Cases: From Filing Through Trial, 15 No. 1, *Competition: J. of the Antitrust and Unfair Competition Law Section of the State Bar of*

*California* 23 (2006); L. Saveri & Co-Author, Does the Cartwright Act Have A Future?, 17 No. 2, *Competition: J. of the Antitrust and Unfair Competition Law Section of the State Bar of California* 31 (2008); L. Saveri & Co-Authors, Chapter 21: Class Actions in Competition and Consumer Protections Cases in California State Antitrust and Unfair Competition Law 773-822 (Cheryl Lee Johnson, ed., Matthew Bender & Co., 2009) and 2010 update; L. Saveri & Co-Authors, Chapter 22: Indirect Purchaser Actions in California State Antitrust and Unfair Competition Law (Cheryl Lee Johnson, ed., Matthew Bender & Co., Supp. 2010); LexisNexis Corporate & Securities Law Community Podcast, *Class Actions in Competition and Consumer Protection Cases* (Recorded Sept. 21, 2010). *Professional Affiliations*: U. S. District Court, Northern District of California, Special Master, Standing Committee on Professional Conduct (appointment) (2008–2011); State Bar of California, Antitrust and Unfair Competition Law Section, Executive Committee, Member (appointment) (2005–2010), Secretary (2007–2009), First Vice-Chair (2009–2010), Advisory Committee (2010–present). *Honors & Distinctions*: Recognized by *Best Lawyers*, 2019. Named a “Super Lawyer for Northern California” in 2020.

**CADIO ZIRPOLI**, born Washington D.C., September 1, 1967; admitted to bar, 1995, California and U.S. District Court, Northern District of California; 2015, U.S. Court of Appeals, Ninth Circuit. *Education*: University of California, Berkeley (B.A., 1989); University of San Francisco School of Law (J.D., *cum laude*, 1995). *Experience*: Assistant District Attorney, City and County of San Francisco 1996–2000. *Member*: State Bar of California.

Mr. Zirpoli has an AV Preeminent Peer Review Rating on Martindale-Hubbell and was named a “Super Lawyer for Northern California” in 2010, 2014–2020 (Top 100 Northern California Super Lawyers, 2018 and 2019).

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#### **OF COUNSEL**

**GEOFFREY C. RUSHING**, born San Jose, California, May 21, 1960; admitted to bar, 1986, California and U.S. District Court, Northern District of California; 2017, U.S. Court of Appeals, Ninth Circuit. *Education*: University of California, Berkeley (A.B. with honors, 1982); University of California, Berkeley, Boalt Hall (J.D., 1986). *Member*: State Bar of California. *Honors & Distinctions*: Named a “Super Lawyer for Northern California” in 2020.

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#### **ASSOCIATES**

**MATTHEW D. HEAPHY**, born Hartford, Connecticut, December 4, 1974, admitted to bar, 2003, California and U.S. District Court, Northern District of California; 2017, U.S. Court of Appeals, Ninth Circuit. *Education*: Wesleyan University (B.A., 1997); University of San Francisco School of Law (J.D., *cum laude*, 2003), University of San Francisco Law Review, International & Comparative Law Certificate, with Honors. *Publications*: Comment: The Intricacies of Commercial Arbitration in the United States and Brazil: A Comparison of Two National Arbitration Statutes, 37 U.S.F. L. Rev. 441 (2003); M. Heaphy & Co-Author, Does the United States Really Prosecute its Servicemembers for War Crimes? Implications for Complementarity Before the ICC, 21 Leiden J. Int’l L. 165 (March 2008); M. Heaphy, The



United States and the 2010 Review Conference of the Rome Statute of the ICC, 81 Int'l Rev. Penal L. 77 (2010). *Member*: State Bar of California. *Languages*: French, Italian.

**MELISSA SHAPIRO**, born Los Angeles, California, May 27, 1980, admitted to bar, 2006, California and U.S. District Court, Northern and Central Districts of California. *Education*: University of Southern California (B.A., 2002); Pepperdine University School of Law (J.D., 2005), Pepperdine Law Review. *Publication*: Comment: Is Silica the Next Asbestos? An Analysis of the Sudden Resurgence of Silica Lawsuit Filings, 32 Pepp. L. Rev. 983 (2005).

**DAVID HWU**, born Stanford, California, November 20, 1985; admitted to bar, 2012, California and U.S. District Court, Northern District of California. *Education*: University of California, Berkeley (B.A., 2008); University of San Francisco School of Law (J.D., 2011). *Member*: State Bar of California. *Languages*: Chinese, Japanese. *Honors & Distinctions*: Named to the Super Lawyers Northern California Rising Stars List, 2018–2020.

**SARAH VAN CULIN**, born London, England, September 2, 1985, admitted to bar, 2013, California; 2015, U.S. District Court, Northern District of California; 2020, U.S. District Court, Central District of California. *Education*: University of Nottingham (B.A., English, 2007); University of San Francisco School of Law (J.D., *cum laude*, 2013), Editor in Chief, University of San Francisco Law Review, Business Law Certificate, with Honors. *Member*: State Bar of California, Antitrust, UCL and Privacy Section; American Bar Association, Section of Antitrust Law; Bar Association of San Francisco, Antitrust and Business Regulation Section. *Honors & Distinctions*: Named to the Super Lawyers Northern California Rising Stars List, 2018–2020.

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#### **LEGAL ASSISTANTS**

**ALYSSA WEAVER** (Paralegal), born San Mateo, California, August 10, 1989. *Education*: City College of San Francisco (A.S. 2015).

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### **ADDITIONAL LEADERSHIP POSITIONS**

The following are some of the class actions in which Mr. Guido Saveri actively participated:

***Nisley v. Union Carbide and Carbon Corp.***, 300 F. 2d 561 (10th Cir. 1960), and ***Continental Ore. Co. v. Union Carbide and Carbon Corp.***, 370 U.S. 690 (1962). In 1960, Mr. Saveri was one of the trial attorneys in the above cases which are the forerunners of present class action litigation and are responsible for Rule 23 as it exists today and for some of the most important rulings in the field of antitrust law. The *Nisley* case was a class action tried before a jury both on liability and damages and resulted in a verdict for the named plaintiffs and the entire class. It is considered one of the leading cases on class actions, is often referred to as a model for the trial of class actions, and has been followed in antitrust class action cases which have gone to trial.

***Sacramento Municipal Utility District v. Westinghouse Elec. Corp.***, 62 CCH Trade Cases, Par. 70,552 (N.D. Cal. 1962). Mr. Saveri was one of the principal attorneys in several cases which have come to be known as the *Electrical Equipment* cases. In 1961–1965, Mr. Saveri represented such clients as the State of Washington, Sacramento Municipal Utility District and Modesto Irrigation District. Mr. Saveri was one of the attorneys who tried several of these cases and did very extensive work under a coordinated program instituted by the Murrah Committee under the direction of the then Chief Justice of the United States. This Committee later became the Judicial Panel for Multi-District Litigation. As a result of his experience in these cases, Mr. Saveri participated in drafting proposed legislation creating the Panel on Multi-District Litigation.

***Nurserymen's Exchange v. Yoder Brothers, Inc.***, No. 70-1510, in the United States District Court, Northern District of California, before Judge Harris. Mr. Saveri was the sole attorney for a class of 10,000 chrysanthemum growers. This case was settled for substantial sums.

***City of San Diego v. Rockwell Manufacturing Co.***, before Judge Boldt in San Francisco. Mr. Saveri was Liaison and Lead Counsel in the above case involving water meters. This case was settled for substantial sums.

***In re Private Civil Treble Damage Actions Against Certain Snack Food Companies***, Civil No. 70-2121-R, United States District Court, Central District of California. Mr. Saveri was the lead attorney for the retail grocers' class comprised of all retail grocers in the states of California, Nevada, and Arizona certified by Judge Real involving the snack food industry. The case was settled for substantial sums.

***In re Sugar Antitrust Litigation***, MDL No. 201, United States District Court, Northern District of California, before Judges Boldt and Cahn. Mr. Saveri was the lead attorney for the retail grocer classes in the Western Sugar litigation. In this litigation, he was a member of the Executive Committee, Steering Committee and Settlement Committee. This case settled for more than \$35,000,000.

***Sun Garden Packing Co. v. International Paper Co., et al.***, C-72-52, United States District Court, Northern District of California. In 1972 Mr. Saveri filed the first price fixing class action against the paper industry. He was the sole attorney representing all purchasers of



lithograph paper labels in the United States. The lithograph paper labels case was settled at a substantial figure. The lithograph paper labels case was responsible for subsequent government indictments in lithograph paper labels, folding cartons, small paper bags, and corrugated containers.

***In re Folding Carton Antitrust Litigation***, MDL No. 250, United States District Court, Eastern District of Illinois, before Judges Will and Robson. Mr. Saveri was a member of the Executive Committee, Vice Chairman of Discovery and a member of the Trial Team in this action involving a horizontal conspiracy to fix prices for folding cartons. The case was settled for more than \$200,000,000.

***In re Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions***, MDL No. 10, 4-72 Civ 435, United States District Court, District of Minnesota, Fourth Division, before Judge Lord. Mr. Saveri was the attorney for the institutional class and consumer class for the States of Utah and Hawaii. These actions were settled for substantial sums.

***Building Service Union Health & Welfare Trust Fund v. Chas. Pfizer & Co.***, No. 4-71 Civ. 435; No. 4-71 Civ. 413, United States District Court, District of Minnesota, before Judge Lord. Mr. Saveri was the sole attorney for a class of 9,000 health and welfare trust funds in the United States in this antitrust action against the drug companies. In 1974–1975 this class action went to trial before two juries at the same time and in the same court on liability and damages for the entire class and lasted ten months. It was settled for a substantial sum. Mr. Saveri was the sole attorney representing the plaintiff health and welfare trust fund class at trial.

***In re Corrugated Container Antitrust Litigation***, MDL No. 310, United States District Court, Southern District of Texas, before Judge Singleton. Horizontal price fixing action. The case was settled for more than \$400,000,000.

***In re Fine Paper Antitrust Litigation***, MDL No. 323, United States District Court, Eastern District of Pennsylvania, before Judge McGlynn. Mr. Saveri was a member of the Executive Committee and the trial team. The case was settled for approximately \$80,000,000.

***In re Ocean Shipping Antitrust Litigation***, MDL No. 395, United States District Court, Southern District of New York, before Judge Stewart. Mr. Saveri was a member of the Steering Committee and the Negotiating Committee. The firm understands this case was the first class action settlement involving claims by foreign companies. Mr. Saveri was appointed an officer of the New York Federal District Court to audit foreign claims in Europe. The case was settled for approximately \$79,000,000.

***In re Corn Derivatives Antitrust Litigation***, MDL No. 414, United States District Court, District of New Jersey, before Judge Seitz. Mr. Saveri was Chairman of the Steering Committee and Executive Committee.

***In re Coconut Oil Antitrust Litigation***, MDL No. 474, United States District Court, Northern District of California, before Judge Orrick. Mr. Saveri was Co-Lead Counsel.

***In re Intel Securities Litigation***, No.C-79-2168A, United States District Court, Northern District of California, before Judge Aguilar. Mr. Saveri was a member of the Steering Committee.

***O'Neill Meat Co. v. Eli Lilly and Co.***, No. 30 C 5093, United States District Court, Northern District of Illinois, before Judge Holderman. Mr. Saveri was Co-Lead Counsel for the class in this antitrust litigation involving pancreas glands.

***United National Records, Inc. v. MCA, Inc.***, No.82 C 7589, United States District Court, Northern District of Illinois, before Judge Bua. Mr. Saveri was a member of the Steering Committee in this records antitrust litigation. The class recovered \$26,000,000 in cash and assignable purchase certificates.

***In re Industrial Gas Antitrust Litigation***, No. 80 C 3479, United States District Court, Northern District of Illinois, before Judge Endamer. Mr. Saveri was a member of the Steering Committee. The class recovered more than \$50,000,000.

***Superior Beverages, Inc. v. Owens-Illinois***, No. 83-C512, United States District Court, Northern District of Illinois, before Judge Will. Mr. Saveri was a member of the Executive Committee in this antitrust litigation involving the price fixing of glass containers. The class recovered more than \$70,000,000 in cash and coupons.

***In re Washington Public Power Supply Securities Litigation***, MDL No. 551, United States District Court, W.D. Washington, Second (Seattle) Division, before Judge Browning. Mr. Saveri was one of the court appointed attorneys for the class.

***In re Ask Computer Systems Securities Litigation***, No. C-85-20207 (A) RPA, United States District Court, Northern District of California, before Judge Aguilar. Mr. Saveri was Co-Lead Counsel for the class.

***Big D. Building Corp. v. Gordon W. Wattles.***, MDL No. 652, United States District Court, Middle District of Pennsylvania. Mr. Saveri was a member of the Steering Committee and Settlement Committee in this price fixing class action involving the rope industry.

***In re Insurance Antitrust Litigation***, MDL No. 767, United States District Court, Northern District of California, before Judge Schwarzer. Mr. Saveri was Administrative Liaison Counsel and a member of the Steering Committee.

***In re Sun Microsystems Securities Litigation***, No. C-89-20351 RMW, United States District Court, Northern District of California, before Judge Whyte. Mr. Saveri was appointed Co-Lead Counsel.

***In re Infant Formula Antitrust Litigation***, MDL No. 878, United States District Court, Northern District of Florida, Tallahassee Division. Mr. Saveri was one of the principal attorneys. The case was settled for \$125,760,000.

***In re Carbon Dioxide Industry Antitrust Litigation***, MDL No. 878, Case No. 92-940 PHB, United States District Court, Middle District of Florida, Orlando Division. Mr. Saveri was a member of the Steering Committee. The class recovered \$53,000,000 and achieved significant therapeutic relief for the class.

***In re Medical X-Ray Film Antitrust Litigation***, No. CV 93-5904, FB, United States District Court, Eastern District of New York. Mr. Saveri was a member of the Steering Committee.

***In re Baby Food Antitrust Litigation***, No. 92-5495 NHP, United States District Court, District of New Jersey, before Judge Politan. Mr. Saveri was a member of the Steering Committee.

***In re Brand Name Prescription Drugs Antitrust Litigation***, MDL No. 997, Case No. 94-C-897 CPK, United States District Court, Northern District of Illinois, Eastern Division, before Judge Kocoras. Mr. Saveri was Co-Lead Counsel on behalf of approximately 50,000 retail pharmacies nationwide alleging an illegal cartel between seventeen drug manufacturers and six drug wholesalers in preventing discounts to retail pharmacies. The case was tried for eight weeks. The case was settled for \$700,000,000 in cash and \$25,000,000 in product. Mr. Saveri was one of four lead trial lawyers.

***In re Citric Acid Antitrust Litigation***, MDL No. 1092, C-95-2963 FMS, United States District Court, Northern District of California, before Judge Smith. Mr. Saveri was Co-Lead Counsel representing a certified class of purchasers of citric acid throughout the United States against the citric acid manufacturers for violations of the Sherman Act for fixing the price of citric acid in the United States and around the world. The case was settled for \$86,000,000.

***In re Methionine Antitrust Litigation***, MDL No. 1311 CRB, United States District Court, Northern District of California, before Judge Breyer. A nationwide class action on behalf of direct purchasers of methionine alleging price-fixing. Saveri & Saveri, Inc. served as Co-Lead Counsel in this litigation. The case was settled for \$107,000,000.

***In re Managed Care Litigation***, MDL No. 1334, Master File No. 00-1334-MD, United States District Court, Southern District of Florida, before Judge Moreno. The Saveri Firm served as a member of the Executive Committee representing the California Medical Association, Texas Medical Association, Georgia Medical Association and other doctors against the nation's HMOs for violations of the Federal RICO Act. The case was settled with benefits approximating \$1 billion dollars.

***In re Dynamic Random Access Memory Antitrust Litigation***, MDL No. 1486, United States District Court, Northern District of California, before Judge Hamilton. Mr. Saveri served as Co-Lead Counsel on behalf of a nationwide class of direct purchasers of dynamic random access memory (DRAM) alleging price-fixing. The case settled for more than \$325 million in cash.

***In re Flash Memory Antitrust Litigation***, No. 07-cv-00086-SBA, United States District Court, Northern District of California, before Judge Armstrong. Mr. Saveri served as Co-Lead Counsel on behalf of a nationwide class of direct purchasers of flash memory (Flash) alleging price-fixing.

***In re Cathode Ray Tube (CRT) Antitrust Litigation***, MDL No. 1917, Case No. C 07-5944 JST, United States District Court, Northern District of California before Judge Tigar. Mr. Saveri serves as Lead Counsel on behalf of a nationwide class of direct purchasers of cathode ray tubes (CRTs) alleging price-fixing.

***In re Optical Disk Drive (ODD) Products Antitrust Litigation***, MDL No. 2143, 10-md-02143-RS, United States District Court, Northern District of California, before Judge Seeborg. Mr. Saveri served as Chair of the Committee of Direct Purchaser Plaintiffs' Counsel on behalf of a nationwide class of direct purchasers of optical disk drives (ODDs) alleging price-fixing.

## **CLASS ACTION LITIGATION**

The following are some additional class action cases in which Saveri & Saveri, Inc. actively participated as class counsel:

***In re NASDAQ Market-Makers Antitrust Litigation***, MDL No. 1023, United States District Court, Southern District of New York. A nationwide class action on behalf of purchasers of securities on the NASDAQ market alleging a violation of the Sherman Act for fixing the spread between the quoted buy and sell prices for the securities sold on the NASDAQ market.

***In re Potash Antitrust Litigation***, MDL No. 981, United States District Court, District of Minnesota, Third Division. A class action on behalf of all direct purchasers of potash throughout the United States alleging a horizontal price fix.

***In re Airline Ticket Commission Antitrust Litigation***, MDL No. 1058, United States District Court, District of Minnesota. A class action alleging that the major airlines conspired to fix travel agents' commission rates.

***Pharmaceutical Cases I, II & III***, J.C.C.P. Nos. 2969, 2971 & 2972, San Francisco Superior Court. A certified class action on behalf of all California consumers against the major drug manufacturers for fixing the price of all brand name prescription drugs sold in California.

***Perish v. Intel Corp.***, Civ. No. 755101, Santa Clara Superior Court. A nationwide class action on behalf of purchasers of Intel Pentium chips alleging consumer fraud and false advertising.

***In re Carpet Antitrust Litigation***, MDL No. 1075, United States District Court, Northern District of Georgia, Rome Division. A nationwide class action on behalf of all direct purchasers of polypropylene carpet alleging a horizontal price fix.

***In re California Indirect-Purchaser Plasticware Antitrust Litigation***, Civ. Nos. 961814, 963201, 963590, San Francisco Superior Court. A class action on behalf of indirect purchasers of plasticware alleging price-fixing.

***In re Worlds of Wonder Securities Litigation***; No.C-87-5491 SC, United States District Court, Northern District of California.

***Pastorelli Food Products, Inc. v. Pillsbury Co., et al.***, No. 87C 20233, United States District Court, Northern District of Illinois.

***Red Eagle Resources Corp., et al. v. Baker Hughes Incorporated, et al.***, No. 91-627 (NWB) (Drill Bits Litigation), United States District Court, Southern District of Texas, Houston Division.

***In re Wirebound Boxes Antitrust Litigation***, MDL No. 793, United States District Court, District of Minnesota, Fourth Division. A nationwide class action on behalf of purchasers of wirebound boxes alleging a horizontal price fix.

***In re Bulk Popcorn Antitrust Litigation***, No. 3-89-710, United States District Court, District of Minnesota, Third Division. A nationwide class action on behalf of direct purchasers of bulk popcorn alleging price-fixing.

***Nancy Wolf v. Toyota Sales, U.S.A. and Related Cases***, No. C 94-1359, United States District Court, Northern District of California.

**Mark Notz v. Ticketmaster - Southern, and Related Cases**, No. 943327, San Francisco Superior Court. A consumer class action alleging a territorial allocation in violation of the Cartwright Act.

**Neve Brothers v. Potash Corp.**, No. 959867, San Francisco Superior Court. A class action alleging price-fixing on behalf of indirect purchasers of potash in California.

**In re Chrysler Corporation Vehicle Paint Litigation**, MDL No. 1239. Nationwide class action on behalf of owners of delaminating Chrysler vehicles.

**Miller v. General Motors Corp.**, Case No. 98 C 7836, United States District Court, Northern District of Illinois. Nationwide class action alleging a defective paint process which causes automobile paint to peel off when exposed to ordinary sunlight.

### **ANTITRUST LITIGATION**

The following list outlines some of the antitrust litigation in which the firm of Saveri & Saveri has been involved:

1. **Union Carbide & Carbon Corp. v. Nisley**, 300 F. 2d 561 (10th Cir. 1960)
2. **Continental Ore. Co. v. Union Carbide and Carbon Corp.**, 370 U.S. 690 (1962)
3. **Public Service C. of N.M. v. General Elec. Co.**, 315 F.2d 306 (10th Cir. 1963)
4. **State of Washington v. General Elec. Co.**, 246 F. Supp. 960 (W.D. Wash. 1965)
5. **Nurserymen's Exchange v. Yoder Brothers, Inc.**, No. 70-1510 (N.D. Cal. 1970)
6. **Bel Air Markets v. Foremost Dairies Inc.**, 55 F.R.D. 538 (N.D. Cal. 1972)
7. **In re Western Liquid Asphalt Case**, 487 F.2d 191 (9th Cir. 1973)
8. **In re Gypsum Cases**, 386 F. Supp. 959 (N.D. Cal. 1974)
9. **City of San Diego v. Rockwell Manufacturing Co.**
10. **In re Private Civil Treble Damage Actions Against Certain Snack Food Companies**, Civil No. 70-2121-R (C.D. Cal. 1970)
11. **In re Sugar Antitrust Litigation**, MDL No. 201, 559 F.2d 481 (9th Cir. 1977)
12. **Sun Garden Packing Co. v. International Paper Co.**, No. C-72-52 (N.D. Cal. 1972)
13. **In re Folding Carton Antitrust Litigation**, MDL No. 250 (E.D. Ill.)
14. **In re Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions**, No. 4-72 Civ 435, 410 F. Supp. 706 (D. Minn. 1972)
15. **Building Service Union Health & Welfare Trust Fund v. Chas. Pfizer & Company**, Nos. 4-71 Civ. 435, 4-71 Civ. 413 (D. Minn. 1971)
16. **In re Fine Paper Antitrust Litigation**, MDL No. 323 (E.D. Pa.)
17. **In re Armored Car Antitrust Litigation**, CA No. 78-139A, 472 F. Supp. 1357 (N.D. Ga. 1978)



18. *In re Ocean Shipping Antitrust Litigation*, MDL No. 395, 500 F. Supp. 1235 (3d Cir. 1984)
19. *In re Corn Derivatives Antitrust Litigation*, MDL No. 414 (D.N.J. 1980)
20. *In re Coconut Oil Antitrust Litigation*, MDL No. 474 (N.D. Cal.)
21. *Garside v. Everest & Jennings Intern.*, No. S-80-82 MLS, 586 F. Supp. 389 (E.D. Cal. 1984)
22. *Lorries Travel & Tours, Inc. v. SFO Airporter Inc.*, 753 F.2d 790 (9th Cir. 1985)
23. *O'Neill Meat Co. v. Eli Lilly and Company*, No. 30 C 5093 (N.D. Ill.)
24. *In re Records and Tapes Antitrust Litigation*, No.82 C 7589, 118 F.R.D. 92 (N.D. Ill. 1987)
25. *In re Industrial Gas Antitrust Litigation*, No. 80 C 3479, 100 F.R.D. 280 (N.D. Ill. 1987)
26. *Matter of Superior Beverages/Glass Container Consolidated Pretrial*, No. 83-C512, 137 F.R.D. 119 (N.D. Ill. 1990)
27. *Big D. Building Corp. v. Gordon W. Wattles*, MDL No. 652
28. *In re Insurance Antitrust Litigation*, MDL No. 767 (N.D. Cal.)
29. *In re Wirebound Boxes Antitrust Litigation*, MDL No. 793 (D. Minn.)
30. *In re Domestic Air Transp. Antitrust Litigation*, MDL No. 861, 144 F.R.D. 421 (N.D. Ga. 1992)
31. *In re Infant Formula Antitrust Litigation*, MDL No. 878 (N.D. Fla.)
32. *Finnegan v. Campeau Corp.*, 915 F.2d 824 (2d Cir. 1990)
33. *In re Carbon Dioxide Industry Antitrust Litigation*, MDL No. 940, 155 F.R.D. 209 (M.D. Fla.)
34. *In re Medical X-Ray Film Antitrust Litigation*, No. CV 93-5904 (E.D.N.Y. 1993)
35. *In re Bulk Popcorn Antitrust Litigation*, 792 F. Supp. 650 (D. Minn. 1992)
36. *In re Baby Food Antitrust Litigation*, No. 92-5495 (NHP) (D.N.J. 1992)
37. *In re Potash Antitrust Litigation*, MDL No. 981 (D. Minn.)
38. *In re Brand Name Prescription Drugs Antitrust Litigation*, MDL No. 997, 94 C 897 (N.D. Ill.)
39. *In re Citric Acid Antitrust Litigation*, MDL No. 1092 (N.D. Cal.)
40. *In re NASDAQ Market-Makers Antitrust Litigation*, MDL No. 1023 (S.D.N.Y.)
41. *In re Airline Ticket Commission Antitrust Litigation*, MDL No. 1058 (D. Minn.)
42. *Pharmaceutical Cases I, II & III*, J.C.C.P. Nos. 2969, 2971 & 2972, San Francisco Superior Court
43. *In re Carpet Antitrust Litigation*, MDL No. 1075 (N.D. Ga.)



44. ***In re California Indirect-Purchaser Plastic Ware Antitrust Litigation***, Nos. 961814, 963201, 963590, San Francisco Superior Court
45. ***Pastorelli Food Products, Inc. v. Pillsbury Co.***, No. 87C 20233 (N.D. Ill.)
46. ***Red Eagle Resources Corp. v. Baker Hughes Inc.***, No. 91-627 (NWB) (Drill Bits Litigation) (S.D. Tex.)
47. ***Mark Notz v. Ticketmaster - Southern, and Related Cases***, No. 943327, San Francisco Superior Court
48. ***Neve Brothers. v. Potash Corp.***, No. 959867, San Francisco Superior Court
49. ***Food Additives (Citric Acid) Cases***, J.C.C.P. No. 3625, Master File No. 974-120
50. ***Biljac Associates v. First Interstate Bank***, No. 824-289, San Francisco Superior Court
51. ***Diane Barela v. Ralph's Grocery Co.***, No. BC070061, Los Angeles Superior Court
52. ***Leslie K. Bruce v. Gerber Products Co.***, No. 948-857, San Francisco Superior Court
53. ***In re California Indirect Purchaser Medical X-Ray Film Antitrust Litigation***, Master File No. 960886
54. ***Lee Bright v. Kanzaki Specialty Papers, Inc.***, No. 963-598, San Francisco Superior Court
55. ***Neve Brothers v. Potash Corporation of America***, No. 959-767, San Francisco Superior Court
56. ***Gaehwiler v. Sunrise Carpet Industries Inc.***, No. 978345, San Francisco Superior Court
57. ***In re Commercial Tissue Products Antitrust Litigation***, MDL No. 1189 (N.D. Fla.)
58. ***Sanitary Paper Cases I and II***, J.C.C.P. Nos. 4019 & 4027, San Francisco Superior Court
59. ***Gaehwiler v. Aladdin Mills, Inc.***, No. 300756, San Francisco Superior Court
60. ***In re Flat Glass Antitrust Litigation***, MDL No. 1200 (3d Cir.)
61. ***Flat Glass Cases***, J.C.C.P. No. 4033, San Francisco Superior Court
62. ***Sorbate Prices Cases***, J.C.C.P. No. 4073, San Francisco Superior Court
63. ***In re Stock Options Trading Antitrust Litigation***, MDL No. 1283 (S.D.N.Y.)
64. ***In re Vitamin Antitrust Litigation***, MDL No. 1285 (D.D.C.)
65. ***In re Sorbates Direct Purchaser Antitrust Litigation***, Master File No. C 98-4886 CAL (N.D. Cal. 1998)
66. ***Vitamin Cases***, J.C.C.P. No. 4076, San Francisco Superior Court
67. ***In re PRK/Lasik Consumer Litigation***, Master File No. CV 772894, Santa Clara Superior Court
68. ***In re Nine West Shoes Antitrust Litigation***, Master File No. 99-CV-0245 (BDP) (S.D.N.Y. 1999)
69. ***Food Additives (HFCS) Cases***, J.C.C.P. No. 3261, Stanislaus County Superior Court

70. ***In re Toys “R” Us Antitrust Litigation***, MDL No. 1211 (E.D.N.Y.)
71. ***Cosmetics Cases***, J.C.C.P. No. 4056, Marin County Superior Court
72. ***In re Methionine Antitrust Litigation***, MDL No. 1311 (N.D. Cal.)
73. ***Bromine Cases***, J.C.C.P. No. 4108
74. ***Fu’s Garden Restaurant v. Archer-Daniels-Midland***, No. 304471, San Francisco Superior Court
75. ***Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives and Composites, Inc.***, No. CV 99-07796 GHK (C.D. Cal. 1999)
76. ***In re Monosodium Glutamate Antitrust Litigation***, MDL No. 1328 (D. Minn.)
77. ***California Indirect Purchaser Auction House Cases***, Master Case No. 310313, San Francisco Superior Court
78. ***In re Cigarette Antitrust Litigation***, MDL No. 1342 (N.D. Ga.)
79. ***Cigarette Price Fixing Cases***, J.C.C.P. No. 4114, Alameda County Superior Court
80. ***Microsoft Cases***, J.C.C.P. No. 4106, San Francisco Superior Court
81. ***Compact Disk Cases***, J.C.C.P. No. 4123, Los Angeles Superior Court
82. ***In re Compact Disc Minimum Advertised Price Antitrust Litigation***, MDL No. 1361 (D. Me.)
83. ***In re Ciprofloxacin Hydrochloride Antitrust Litigation***, MDL No. 1383 (E.D.N.Y.)
84. ***In re Buspirone Antitrust Litigation***, MDL No. 1413 (S.D.N.Y.)
85. ***In re K-Durr Prescription Drug Antitrust Litigation***, MDL No. 1419
86. ***Carbon Cases***, J.C.C.P. Nos. 4212, 4216 and 4222, San Francisco Superior Court
87. ***In re Polychloroprene Antitrust Cases***, J.C.C.P. No. 4376, Los Angeles Superior Court
88. ***In re Urethane Cases***, J.C.C.P. No. 4367, San Francisco Superior Court
89. ***The Harman Press v. International Paper Co.***, Master File No. CGC-04-432167, San Francisco Superior Court
90. ***In re Label Stock Cases***, J.C.C.P. No. 4314, San Francisco Superior Court
91. ***Richard Villa v. Crompton Corp.***, Master File No. CGC-03- 419116, San Francisco Superior Court
92. ***Russell Reidel v. Norfalco LLC***, Master File No. CGC-03-418080, San Francisco Superior Court
93. ***Smokeless Tobacco Cases I-IV***, J.C.C.P. Nos. 4250, 4258, 4259, & 4262, San Francisco Superior Court
94. ***Natural Gas Antitrust Cases***, J.C.C.P. No. 4312
95. ***In re Western States Wholesale Natural Gas Litigation***, MDL No. 1566 (D. Nev.)

96. *In re Automotive Refinishing Paint Cases*, J.C.C.P. No. 4199, Alameda County Superior Court
97. *In re Tableware Antitrust Litigation*, Master File No. C-04-3514 VRW (N.D. Cal. 2004)
98. *In re Credit/Debit Card Tying Cases*, J.C.C.P. No. 4335, San Francisco Superior Court
99. *In re NBR Cases*, J.C.C.P. No. 4369, San Francisco Superior Court
100. *Competition Collision Center, LLC v. Crompton Corp.*, No. CGC-04-431278, San Francisco Superior Court
101. *In re Urethane Chemicals Antitrust Litigation*, MDL No. 1616 (D. Kan.)
102. *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.)
103. *Carpinelli v. Boliden AB*, Master File No. CGC-04-435547, San Francisco Superior Court
104. *Automobile Antitrust Cases I and II*, J.C.C.P. Nos. 4298 and 4303, San Francisco Superior Court
105. *In re Currency Conversion Fee Antitrust Litigation*, MDL No. 1409 (S.D.N.Y.)
106. *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, MDL No. 1486 (N.D. Cal.)
107. *In re Publication Paper Antitrust Litigation*, MDL No. 1631 (D. Conn.)
108. *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1663 (D.N.J.)
109. *In re Hydrogen Peroxide Antitrust Litigation*, MDL No. 1682 (E.D. Pa.)
110. *In re Intel Corp. Microprocessor Antitrust Litigation*, MDL No. 1717 (D. Del.)
111. *In re Air Cargo Shipping Services Antitrust Litigation*, MDL No. 1775 (E.D.N.Y.)
112. *In re International Air Transportation Surcharge Antitrust Litigation*, MDL No. 1793 (N.D. Cal.)
113. *Carbon Black Cases*, J.C.C.P. No. 4323, San Francisco Superior Court
114. *Madani v. Shell Oil Co.*, No. 07-CV-04296 MJJ (N.D. Cal.)
115. *In re Static Random Access Memory (SRAM) Antitrust Litigation*, MDL No. 1819 (N.D. Cal.)
116. *In re Flash Memory Antitrust Litigation*, No. 07-CV-00086-SBA (N.D. Cal.)
117. *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827 (N.D. Cal.)
118. *In re Korean Air Lines Co., Ltd., Antitrust Litigation*, MDL No. 1891 (C.D. Cal.)
119. *In re Fasteners Antitrust Litigation*, MDL No. 1912 (E.D. Pa.)
120. *In re Transpacific Passenger Air Transportation Antitrust Litigation*, MDL No. 1913 (N.D. Cal.)
121. *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917 (N.D. Cal.)
122. *In re Chocolate Confectionary Antitrust Litigation*, MDL No. 1935 (M.D. Pa.)

123. *In re Flat Glass Antitrust Litigation (II)*, MDL No. 1942 (W.D. Pa.)
124. *In re Municipal Derivatives Antitrust Litigation*, MDL No. 1950 (S.D.N.Y.)
125. *In re Aftermarket Filters Antitrust Litigation*, MDL No. 1957 (N.D. Ill.)
126. *In re Puerto Rican Cabotage Antitrust Litigation*, MDL No. 1960 (D.P.R.)
127. *In re Hawaiian and Guamanian Cabotage Antitrust Litigation*, MDL No. 1972 (W.D. Wash.)
128. *In re California Title Insurance Antitrust Litigation*, No. 08-01341 JSW (N.D. Cal.)
129. *In re Optical Disk Drive (ODD) Antitrust Litigation*, MDL No. 2143 (N.D. Cal.)
130. *Kleen Products LLC v. Packaging Corporation of America*, No. 10-5711 (N.D. Ill.)
131. *In re Automotive Parts Antitrust Litigation*, MDL No. 2311 (E.D. Mich.)
132. *In re On-Line Travel Company (OTC)/Hotel Booking Antitrust Litigation*, MDL No. 2405 (N.D. Tex.)
133. *In re Lithium Ion Batteries Antitrust Litigation*, MDL No. 2420 (N.D. Cal.)
134. *In re Capacitors Antitrust Litigation*, Master File No. 14-cv-03264 JD (N.D. Cal.)
135. *In re Resistors Antitrust Litigation*, Master File No. 15-cv-03820 JD (N.D. Cal.)
136. *In re Domestic Airline Travel Antitrust Litigation*, MDL No. 2656 (D.D.C.)
137. *In re Inductors Antitrust Litigation*, Master File No. 18-cv-00198 EJD (N.D. Cal.)
138. *In re Dynamic Random Access Memory (DRAM) Direct Purchaser Antitrust Litigation*, No. 18-cv-3805-JSW-KAW (N.D. Cal.)

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